

JUL 19 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

JULIA C. DUDLEY, CLERK
BY:  DEPUTY CLERK

UNITED STATES OF AMERICA

v.

GRACE LEE
Defendant

)
) Criminal No. 6:18CR8
)

) INDICTMENT
)

) In Violation of:
) 18 U.S.C. § 641
) 18 U.S.C. §1001

COUNT ONE

(Theft of Government Money)

The Grand Jury charges that:

1. On or about and between January 2016 and November 2017, in the Western District of Virginia, GRACE LEE, did willfully and knowingly steal and convert to her own use, money of the Social Security Administration ("SSA"), a department or agency of the United States, namely Title XVI Supplemental Security Income ("SSI") benefit payments to which she knew she was not entitled, said benefits having a value in excess of \$1,000.

2. All in violation of Title 18, United States Code, Section 641

COUNT TWO

(False Statements)

The Grand Jury charges that:

1. On or about January 16, 2016, in the Western District of Virginia and elsewhere, GRACE LEE, in a matter within the jurisdiction of the Executive Branch of the United States Government, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation.

2. On or about January 16, 2016, falsely represented to the Social Security Administration on a Redetermination Summary for Determining Continuing Eligibility for SSI payments form that she was no longer employed as a Caregiver through the Public Partnerships LLC of Virginia, when in fact she knew that she was gainfully employed as a Caregiver through the Public Partnerships LLC of Virginia.

3. The Social Security Administration is an agency of the Executive Branch of the United States Government.

4. All in violation of Title 18, United States Code, Section 1001.

COUNT THREE
(False Statements)

The Grand Jury charges that:

1. On or about August 18, 2017, in the Western District of Virginia and elsewhere, GRACE LEE, in a matter within the jurisdiction of the Executive Branch of the United States Government, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation.

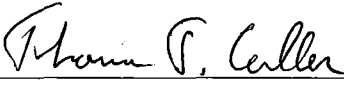
2. On or about August 18, 2017, GRACE LEE falsely represented to the Social Security Administration on a Redetermination Summary for Determining Continuing Eligibility for SSI payments form that she was not employed and had no earnings when in fact she was gainfully employed as a Caregiver through the Public Partnerships LLC of Virginia.

3. The Social Security Administration is an agency of the Executive Branch of the United States Government.

4. All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL this 19th day of July 2018.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON



THOMAS T. CULLEN
UNITED STATES ATTORNEY

by 